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May 17, 2012

VIA ECFS

Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street Washington, D.C. 20554

Re: Telecommunications Carriers Eligible for Universal Service Support, WC Docket No. 09-197; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Dear Ms. Dortch:

On Wednesday, May 16, 2012, Lance Steinhart, John Nakahata, and Heather Kirby, on behalf of Four Star Marketing, LLC d/b/a Midsouth Home Phone ("Four Star" or the "Company"), as well as Joe Black, COO of Four Star, and Alex Rodriguez of CGM, LLC, spoke with Kimberly Scardino, Divya Shenoy, Garnet Hanley and Jonathan Lechter of the Telecommunications Access Policy Division. We discussed Four Star's wireline Compliance Plan as filed on April 27, 2012.

Joe Black gave an overview of the Company and its operational history. Mr. Black highlighted Four Star's experience in the wireline industry, the technical expertise of its management team, and the Company's financial capability and strength of its investors. We discussed the process of receiving the Lifeline subsidy through an underlying carrier versus through USAC. Mr. Black emphasized the Company's commitment to comply with all FCC rules and to prevent waste, fraud, and abuse of the Lifeline program. We discussed Four Star's enrollment process and detailed procedures regarding fraud prevention. We also discussed Four Star's Certification form and suggested changes.

Alex Rodriguez demonstrated CGM's software for facilitating enrollment and proof of eligibility under the new rules, which Four Star intends to utilize.

Finally, Four Star agreed to have all suggested changes made to its Certification form and Compliance Plan and to file a revised Compliance Plan.

Attached is a copy of the presentation deck that was provided at the meeting yesterday. Please contact me if you have any questions. Thank you.

Ms. Marlene H. Dortch May 17, 2012 Page 2

Respectfully submitted,

/s/ LANCE STEINHART

Lance J.M. Steinhart Attorney for Four Star Marketing, LLC d/b/a Midsouth Home Phone

Attachments

cc: Joe Black

John Nakahata Kimberly Scardino Divya Shenoy Garnet Hanley Jonathan Lechter



Presentation
before the
Federal
Communications
Commission
May 16, 2012



Agenda

- Introduction to Mid South Home Phone
- Financial Capability
- Technical Capability
- Lifeline Plans
- Marketing / Advertising Plan
- Enrolling Lifeline Customers
- Recertifying Lifeline Customers
- Preventing Waste, Fraud & Abuse
- Q & A



Mid-South Home Phone

- Names and Identifiers:
 - Four Star Marketing, LLC dba Mid-South Home Phone



Mid-South Home Phone

- In compliance with newly amended section 54.202, Four Star certifies:
 - It will comply with the service requirements applicable to the support that it receives;
 - It has the ability to remain functional in emergency situations;
 - It will satisfy applicable consumer protection and service quality standards; and
 - It is financially and technically capable of providing the Lifeline service.

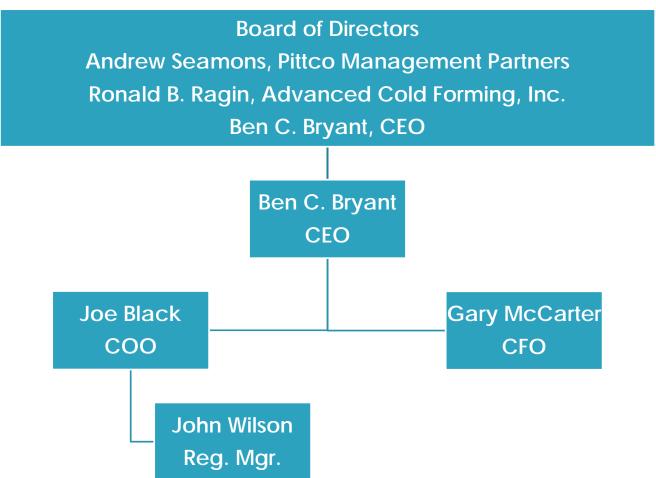


Financial Capability

- Four Star is financially capable of providing the supported Lifeline service :
 - Financial Resources
 - Already providing service in Tennessee & Mississippi

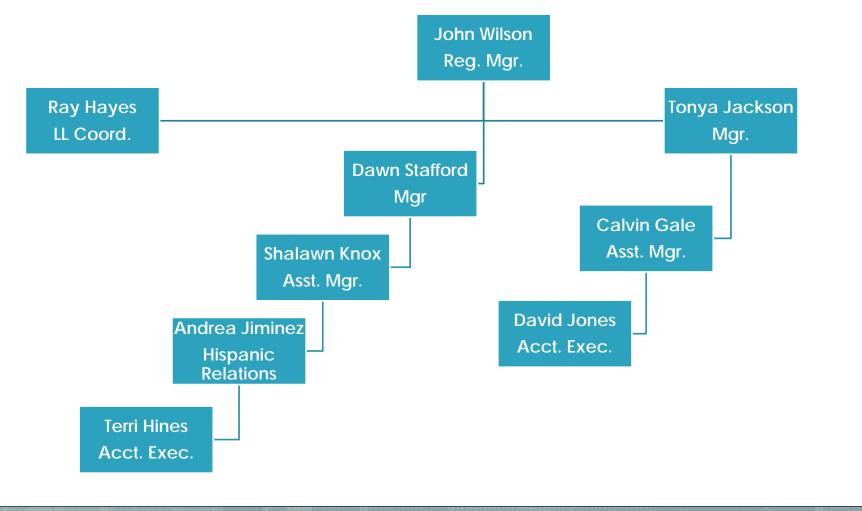


Four Star Marketing, LLC dba Mid-South Home Phone Organization Chart





Four Star Marketing, LLC dba Mid-South Home Phone Organization Chart





Technical Capability

- Four Star is technically capable of providing the supported Lifeline service :
 - Key Management Experience
 - James Black, COO
 - Ben Bryant, CEO
 - Gary McCarter, CFO



Mid-South Home Phone lifeline plans

- Four Star will apply the Lifeline discount to the selected retail rate plan
 - maximum federal subsidy in effect, plus state subsidy where applicable
- All plans include:
 - Unlimited local calls
 - Set amount of toll calls



Mid-South Home Phone lifeline plans

PLAN	Local Minutes	Long Distance Minutes	Vertical Features	Retail Cost	Lifeline Cost*
Basic	Unlimited	60	None	\$33.45	\$19.95
Deuce	Unlimited	60	Caller ID, Call Waiting	\$44.40	\$30.90
Deluxe	Unlimited	60	Caller ID, Call Waiting 3-way Calling, Call Return	\$50.40	\$36.90
Ultra	Unlimited	60	Caller ID, Call Waiting 3-way Calling, Call Return Speed Dial, Call Forward Call Trace, Call Block	\$52.40	\$38.90



Mid-South Home Phone lifeline plans

- Public Safety and 911 / E911 Access
 - Four Star will provide its Lifeline customers with access to 911 and E911 services:
 - through its underlying carrier(s)
 - at the time of Lifeline service initiation



Marketing & Advertising plan

• All materials will :

- Disclose company name under which it does business;
- Explain in clear, easily understood language the following:
 - Only eligible consumer may enroll in the program;
 - The program is limited to one benefit per household, consisting of either wireline or wireless service;
 - Lifeline is a government benefit program;
 - What documentation is necessary for enrollment;
 - Consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or can be barred from the program.



Marketing & Advertising plan



- Four Star intends to market its Lifeline service via:
 - o TV
 - Outdoor signage
 - Internet



Enrolling lifeline customers

Eligibility Confirmation:

- Confirm prospect's identity (see government issued picture ID)
- Confirm program or income eligibility (see proof)
- Confirm valid household address and whether permanent/temporary or multi-household
- 4. Confirm prospect not currently receiving subsidy (ask prospect, perform duplicate check at a minimum into an internal database)



Enrolling lifeline customers

End-User Education and Disclosures:

- Lifeline is a federal non-transferable benefit
- Lifeline service is available for only one line per household
- A household is defined, for Lifeline Program purposes, as any individual or group of individuals who live together at the same address and share income and expenses
- Households are NOT permitted to receive benefits from multiple providers
- Violation of the one per household limitation constitutes violation of the FCC's rules and will result in de-enrollment from the program, and potentially prosecution by the U.S. Government



Enrolling lifeline customers

- End User Attestations:
 - See Certification Form



tase mail or fax this self-certification form to: Mid-South Home Phone 3281 Jackson Ave

Memphis, TN 3812

901-562-1000 Toll Free 1-8 FAX: (901) 320-9094

gned authorization is required in order to earoll you in Four Star Marketing, LLC dots Med-South Home Florin's Lifetine Program in your state. This authorization is only 6 pose of verifying your participation in these programs and will not be used for any, other purpose. Service requests will not be processed until this form has been received.

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(11) I understand that my name, telephone number, date of birth, last four digits of my social security number, and address will be divulged to the	(10)	I authorize and understand that Mid-South Home Phone may provide to state and Federal agencies, as required by law, for the purposes of complying with the Lifeline program all the information related to my account including but not limited to my name, date of birth, social security, usage history, address						
	(11)	I understand that my name, telepho						
	(12)	Service Administrative Company (USAC) and/or its agents for the purpose of verifying that I do not receive more than one Lifeline subsidy. I understand that if USAC identifies I arreceiving more than one Lifeline subsidy, all carriers involved may be notified so that I may select one service and be de-emofuled from the other.						

APPLICANT'S SIGNATURE

DATI



Recertifying lifeline customers

- Annual Recertification Compliance:
 - Four Star commits to re-certify the eligibility of all Lifeline customers (as of June 1, 2012) by the end of 2012 and report the results to USAC by January 31, 2013.
 - Four Star will continue to re-certify all active Lifeline customers by the annual anniversary of their enrollment.
 - All customers who fail to respond to the annual certification request within 30 days will be given additional notice that they have 30 more days to respond. If there is still no response, they will be de-enrolled from the Lifeline program.
 - In addition, Four Star will continue to follow any statespecific requirements.



Preventing waste, fraud & abuse

- Four Star utilizes a diligent Enrollment Process
- Four Star's business model primarily employs direct, high quality contact (retail locations, over the phone/internet)
- Four Star has an ongoing billing relationship with its customers
- Four Star provides TLS to its customers
- Four Star emphasizes compliance in all aspects of the Lifeline program – marketing, enrollment procedures, representative training, process documentation, deenrollment procedures



Preventing waste, fraud & abuse

Additional Measures to prevent Waste, Fraud & Abuse:

- Duplicates Database
 - National Database, when in place
- Provide customer data to PUCs, FCC, and USAC
- Independent Biennial Audits*
 - *if Four Star draws \$5 million+ on an annual basis



Questions?

PROCEDURE FOR VERIFICATION OF BENEFITS

- Account Executive (AE) receives inquiry phone call from prospect
- AE determines whether the prospect would be a LL subscriber or a non-LL subscriber by asking if they currently receive any of the qualifying forms of Government Assistance and advises the prospect they are required to provide proof of identity and verification of benefits before their service is activated.
- AE validates the prospects service address
- AE enters order information into H2o software:
 - o Internal database check for identity duplicates
 - HOLD status will not be released for provisioning until the Self Certification form w/the validation box signed and dated is uploaded to the customer record.
- AE IVR's the LL information via the state self certification form posted on our website: www.midsouthhomephone.com
- AE again advises customer they must provide proof of identity and verification of benefits (fax, email, photocopy) before their order will complete
- AE prints completed LL form awaiting verification LL Coordinator files LL form by last name
- LL Coordinator mails the prospect a Welcome Letter along with a stamped return envelope for their convenience
- LL Coordinator receives validation from the customer matches to the LL form signs/dates validation box uploads to the customer record order completes